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International Pty, Ltd.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BZ CLARITY TENT SUB LLC, dba BASE
ENTERTAINMENT,

Plaintiff,

v.

ROSS MOLLISON INTERNATIONAL
PTY, LTD.,

Defendant.

AND ALL RELATED CLAIMS.

Case No.: 2:15-cv-01065-JCM-CWH

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION TO FILE
INTERIM STATUS REPORT AND
MAKE EXPERT DESIGNATIONS
[SECOND REQUEST FOR
EXTENSION]**

**Discovery Closes: March 3, 2016
Pretrial Order: June 1, 2016
Trial: TBD**

Pursuant to Local Rule 26-4, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff BZ Clarity Tent Sub LLC, d/b/a BASE ENTERTAINMENT (“BASE”), and Defendant Ross Mollison International Pty Ltd (“RMP”), that the deadline for submitting the January 4, 2016 interim status report required by L.R. 26-3, and the deadline for plaintiff's disclosure of experts, both be extended from **January 4, 2016 to January 8, 2016**. No other deadline extensions are sought.

1 The parties request this brief extension because of the voluminous nature of discovery in
2 this case, and the pendency of BASE's recent motion to amend its claims.

3 1. Discovery completed:

- 4 a. To date, the parties have exchanged their initial disclosure documents
5 pursuant to FRCP 26(f).
- 6 b. Plaintiffs served first request for admissions on August 4, 2015.
- 7 c. Plaintiffs served first request for production of documents on August 4, 2015.
- 8 d. Plaintiffs served first interrogatories on August 4, 2015.
- 9 e. Defendants served initial disclosures on August 10, 2015.
- 10 f. Plaintiffs served initial disclosures on August 19, 2015.
- 11 g. Defendants served first request for admissions on September 11, 2015.
- 12 h. Defendants served first request for production of documents on September 11,
13 2015.
- 14 i. Defendants served first interrogatories on September 11, 2015.
- 15 j. Defendants served first supplemental disclosures on September 22, 2015.
- 16 k. Defendants served answers to first request for production of documents on
17 September 22, 2015.
- 18 l. Defendants served answers first request for admissions on September 22,
19 2015.
- 20 m. Defendants served answers to interrogatories on September 22, 2015.
- 21 n. Defendants served supplemental answers to first request for production of
22 documents on September 23, 2015.
- 23 o. Defendants served second supplemental disclosures on September 23, 2015.
- 24 p. Plaintiffs served answers to first request for admissions on November 6, 2015.
- 25 q. Plaintiffs served answers to production of documents on November 6, 2015.
- 26 r. Plaintiffs served answers to first request for production of documents on
27 November 6, 2015.
- 28 s. Plaintiffs served first supplemental disclosures on November 6, 2015.

2. Discovery Remaining:

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a. Supplemental Document and Electronic Data Production in response to
Written Discovery Requests

b. Depositions of parties and third parties.

c. Written Discovery and Subpoenas on Third Parties.

d. Follow up Written Discovery Requests.

e. Expert Witness Disclosures.

f. Rebuttal Witness Disclosures.

g. Expert/Rebuttal Witness(es) Depositions.

3. Proposed Modification: Based on the foregoing, the parties seek to modify the
discovery plan as follows:

a. Deadline for interim status report required by L.R. 26-3: Extended from **January 4,
2016 to January 8, 2016.**

b. Deadline for plaintiff's disclosure of experts: Extended from **January 4, 2016 to
January 8, 2016.**

4. This request is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 4th day of January, 2016.

DATED this 4th day of January, 2016

PISANELLI BICE PLLC

GREENBERG TRAURIG, LLC

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ORDER

Upon stipulation of counsel and good cause appearing therefore,

The above AGREEMENT AND STIPULATION IS SO ORDERED.

DATED: January 5, 2016


UNITED STATES MAGISTRATE JUDGE